

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DOUGLAS P. BROWN, Plaintiff :  
: VS. : NO.04-177 ERIE  
: EDMOND CHEVROLET, INC., SHULTS :  
SALES AND LEASING, INC., EDMOND :  
R. SHULTS, JR., TIM M. SHULTS, :  
Defendants :

DEFENDANTS' REQUESTS FOR PRODUCTION  
DIRECTED TO PLAINTIFF

AND NOW come the Defendants, EDMOND CHEVROLET, INC., by their counsel, ANDREW J. CONNER of CONNER RILEY & FRYLING, 17 West Tenth Street, P.O. Box 860, Erie, Pennsylvania 16512-0860, and submit the following Requests for Production to the Plaintiff, DOUGLAS P. BROWN, to be answered separately and fully in writing under oath within thirty (30) days after the service thereof, pursuant to Rules 30(b)(5) and 34 of the Federal Rules of Civil Procedure.

1) Complete copies of Plaintiffs' federal tax returns for years 2000 through 2004, including copies of all documents (K-1s, 1099s, etc.) attached to those tax returns as filed;  
RESPONSE:

2) Complete copies of all weekly, monthly and yearly Profit & Loss Statements for Shults Sales and Leasing, Inc. for years 2001 through 2003.  
RESPONSE:



3) Complete copies of all memorandums and correspondence in Plaintiffs' possession, custody and control regarding the business of Shults Sales and Leasing, Inc.

RESPONSE:

4) Complete copies of Plaintiffs' American Express records applicable to any American Express credit cards issued to Plaintiff in his name, his wife's name and/or as corporate credit cards issued to Shults Sales and Leasing, Inc. for years 2000 through 2004.

RESPONSE:

5) If not already provided, complete copies of correspondence, memorandums and documents relating to Plaintiff borrowing any money from any third party including, but not limited to, relatives for use as investment funds in Shults Sales and Leasing, Inc., and any correspondence, memorandums and documents relating to the repayment of these funds in 2003 or 2004.

RESPONSE:

6) Complete copies of all memorandums, documents, diaries and reports including, but not limited to, any documents which will be utilized as trial exhibits which summarize or relate to any of the liability and damage claims the Plaintiff has and

which are made reference to in Plaintiffs' Pre-Trial Narrative Statement filed July 10, 2005.

RESPONSE:

7) All documents, memorandums, correspondence and financial reports prepared or received in the regular course of the business of Shults Sales and Leasing, Inc. Which are now in the possession, custody and control of Douglas P. Brown and/or his representatives or legal counsel.

RESPONSE:

Respectfully submitted,

CONNER RILEY & FRYLING

BY Andrew J. Conner  
ANDREW J. CONNER, ESQUIRE  
ATTORNEY FOR PLAINTIFFS  
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DATED: July 25, 2005.